Case:13-00227-MCF Doc#:28 Filed:06/20/14 Entered:06/20/14 11:12:34 Desc: Main

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

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IN RE:	*	
	*	CASE NO. 13-06624 MCF
ANGEL D. DELGADO SAN MIGUEL	* .	
Dobtos	* -	ADV NO. 13-00227 MCF
Debtor.	*	CHAPTER 13
	*	3. D. K. 1. E. K. 1. G
Ángel D. Delgado San Miguel,	*	·
	*	
Plaintiff,	*	
V.	* .	
v.	*	
General Electric Capital of Puerto Rico, Inc.,	* .	
	*	
Defendant.	*	
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JOINT STIPULATION

TO THE HONORABLE COURT

COME NOW, debtor, ANGEL D. DELGADO SAN MIGUEL, and creditor, GENERAL ELECTRIC CAPITAL OF PUERTO RICO (GE Capital), through their undersigned attorneys, and very respectfully alleges and prays:

- Debtor filed a Chapter 13 petition for relief pursuant to the Bankruptcy Code, on August 14, 2013.
- GE Capital is a creditor of the captioned debtor and filed a proof of claim for
 \$79,165.93 as secured creditor.
 - 3. Debtor filed the adversary proceeding of caption on November 15, 2013.

- 4. The parties stipulate that GE Capital will be treated as an unsecured creditor in the sum of \$79,165.93.
 - 5. Debtor hereby recognizes owing GE Capital, \$79,165.93.
- 6. GE Capital will amend the proof of claim to indicate that its claim is unsecured.
- 7. Upon entry of the order, Debtor may proceed to cancel the judgment issued in Case No. D CD 2009-1926, dated October 10, 2012, from the Registry of the Property Bayamon Section IV as entry 372 of diary 281.
- 8. The instant stipulation is agreed between the parties without prejudice to the right of GE Capital to request any additional relief or determination it deems necessary and appropriate, including but not limited to, a motion to dismiss or convert the bankruptcy case.
- 9. Counsels executing this Stipulation represent that they are authorized to file this document on behalf of their respective clients.
- 10. Nothing herein shall be construed as nor shall constitute a waiver of any rights and remedies available to GE Capital against the Debtor concerning the above, all of which rights and remedies are hereby expressly preserved.

NOTICE TO PARTIES IN INTEREST

Parties shall take notice that if no objection is filed, in writing, within twenty (20) days from the date of this notice, with the Clerk of the Court of the U.S. Bankruptcy Court, with copy to the undersigned counsels, this stipulation may be approved without any further notice or hearing.

WHEREFORE, it is respectfully prayed this Honorable Court, that upon notice to all parties in interest as detailed herein, to approve this stipulation and to grant any further relief as deemed necessary.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of May 2014.

LUIS J CUEVAS FONTAN ATTORNEY FOR DEBTOR PO BOX 195143

SAN JUAN, PR 00919-5143

TEL. 787-235-4160

FAX: 787-998-0168

LUIS ∕ CUEVAS FONTAN

USDC-PR 226806

PAVIA & LAZARO, PSC ATTORNEY FOR GE CAPITAL PO BOX 9746 SAN JUAN, PR 00908 TEL. 787-954-9058

GERARDO PAVIA CABANILLAS

USDC-PR 201712

FAX:--787-721-4192